

IN THE COMMON PLEAS COURT OF FRANKLIN COUNTY, OHIO
CIVIL DIVISION

William A. Martin
918 Studer Ave.
Columbus, Ohio 43206

Plaintiff

vs

:

Loews Home Centers, LLC.
3616 E. Broad St.
Columbus, Ohio 43213

Defendant

: Case No.

:

: Judge

:

:

:

:

COMPLAINT

Now comes the Plaintiff, by and through Counsel James E. L. Watson and for his complaint against the Defendant, allege and states as follows:

FIRST CAUSE OF ACTION

Plaintiff, William A. Martin was, at all times a relevant, resident of Franklin County , Ohio, whose last known residence was, 918 Studer Ave., Columbus, Oh. 43206. Defendant, Loews Home Centers LLC. was, at all times a relevant, registered LLC. in the State of Ohio, whose last known business address was 3616 E. Broad St., Columbus, Ohio 43213.

- 1) Plaintiff, William A. Martin was driving his vehicle when he was struck by the operator of a Loews freight liner conventional 6X2 truck, Osvaldo Luis Rivera Mangual.
- 2) The Defendant negligently caused the collision, by not paying attention to the other traffic, heading northbound on Lockbourne Rd. as he attempted to turn right onto E. Whittier St.
- 3) The Plaintiff was behind the Defendant in the proper turning lane also attempting to turn right

4) The defendant made a wide right turn since he was driving a large freight liner conventional 6X2 truck. Plaintiff then made the right turn inside of Defendant and both vehicles struck each other during the turn

5) That all the events hereinafter stated occurred in Franklin County, Ohio on or about 01/29/2018.

6) That immediately prior to and at the same time of the occurrence to be hereinafter described, the Plaintiffs were in the exercise of ordinary care for their own safety and the safety of others, and for the safety of his property and for that of others.

7) That the Defendant's Loews Home Centers LLC. and Osvaldo Luis Rivera Mangual did negligently and violently strike William A. Martin in his automobile.

8) That as a direct and proximate result of said neglect by the Defendant's Loews Home Centers LLC. and Osvaldo Luis Rivera Mangual, Plaintiff, William A. Martin suffered severe injuries.

SECOND CAUSE OF ACTION

9) Plaintiff's incorporate by reference each and every prior subsequent allegation of this complaint as fully restated herein. That by reason of the aforementioned injuries, the Plaintiff was hindered from attending to his usual affairs. The Plaintiff was compelled to expend and/or become liable for great sums of money for hospital and medical services, extensive rehabilitation care and attention in trying to seek treatment for Plaintiff William A. Martin's injuries.

Wherefore, Plaintiff William A. Martin, prays for judgment in his favor and against the Defendant's in excess of \$25,000.00 plus interest as follows:

- A. As compensation for pain, suffering, disability, and diminished ability to apply themselves to productive and recreational activities as the Court and jury shall find to be compensatory;
- B. As reimbursement for medical expenses and other out of pocket expenses, such as sums as the Court and Jury shall

- find to be compensatory;
- C. Plaintiff's cost of suit
 - D. Any other and further relief that the Court deems appropriate.

DEMAND FOR JURY TRIAL

Plaintiff's demands a jury of eight(8) to hear all issues in this matter.

Respectfully Submitted,

/s/ James E. L. Watson

James E. L. Watson, Esq. (0039585)

Counsel for the Plaintiff

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